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12 Attorneys for Defendant

13 ROWLAND MARCUS ANDRADE

14 IN THE UNITED STATES DISTRICT COURT

15 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17
18 THE UNITED STATES OF AMERICA,)
Plaintiff,)

19 vs.)

20 ROWLAND MARCUS ANDRADE,)
Defendant.)

Case No. 3:20-cr-00249-RS

**DECLARATION OF KERRIE C. DENT IN
SUPPORT OF ANDRADE'S MOTION FOR
ADVANCE NOTICE OF GOVERNMENT'S
EXHIBITS**

Judge: Hon. Richard Seeborg

1 Kerrie C. Dent, counsel for Defendant Marcus Andrade, states as follows:

2 1. I am one of the lawyers representing Defendant Marcus Andrade in the above-
3 captioned matter. I file this declaration in support of Mr. Andrade's Motion for Advance Notice
4 of Government's Exhibits because the government has identified more than 1500 exhibits, many
5 of them more than 100 pages, and others more than 1,000 pages. The government was still
6 updating its list as recently as this morning.

7 2. I have personally reviewed about one third of the exhibits on the government's
8 list. Given the volume of exhibits, the length of many of the exhibits, and the constant additions
9 to the list, we will need advance notice to provide adequate time to review, analyze, and assess
10 any potential objections to the evidence the government intends to use against Mr. Andrade.
11 Advance notice also will give us the ability to have hard copies in court.

12 3. The government has produced a mountain of evidence in this case (more than 4
13 TB), a substantial amount of which is not searchable and/or has no individual Bates numbers.
14 The task of reviewing more than 4TB of data has been impossible. Yet, I have had to file more
15 than 20 discovery briefs in order to get core Rule 16 material and exculpatory documents. It is
16 disappointing that the government continues to play "hide the ball" and make it difficult for Mr.
17 Andrade to have easy access to the documents the government will use against him.

18 4. I believe that advance notice of the government's exhibits is necessary to provide
19 Mr. Andrade with the fair trial he deserves.

20 I declare under penalty of perjury under the laws of the United States that the foregoing
21 is true and correct.

22 Executed on February 9, 2025, in San Francisco, California.

23
24 /s/ Kerrie C. Dent
25 Kerrie C. Dent
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